

REMARKS

Claims 1-7, 9-22, and 25-32 are currently pending in the application. By this amendment, claims 8 and 23-24 are cancelled without prejudice or disclaimer to the subject matter contained therein, claims 1-7, 9-22, and 25-32 are amended, and claims 33-46 are added. Support for the amendments is provided in at least figures 7-19 and related text of the present specification. No new matter is added. Reconsideration of the rejected claims in view of the above amendments and the following remarks is respectfully requested.

Drawing Objection

In the Office Action, the drawings were objected to as requiring Figures 1-6 to include "Prior Art" in the legend.

Figures 1-6 are amended to illustrate "Related Art" in the legend, as shown in the attached replacement drawing sheets. Accordingly, Applicants respectfully request withdrawal of the drawing objection.

Rejections Under 35 U.S.C. § 112, first paragraph

Claims 1-10 stand rejected under 35 U.S.C. § 112, first paragraph, as allegedly containing subject matter which was not described in the specification in such a way to reasonably convey to one skilled in the art that the inventors, at the time the application was filed had possession of the claimed invention. Applicants respectfully traverse these rejections.

Applicants respectfully direct the Examiner to the § 2163.04 of the MPEP disclosing:

The inquiry into whether the description requirement is met must be determined on a case-by-case basis and is a question of fact. *In re Wertheim*, 541 F.2d 257, 262, 191 USPQ 90, 96 (CCPA 1976).

A description as filed is presumed to be adequate, unless or until sufficient evidence or reasoning to the contrary has been presented by the examiner to rebut the presumption. *See, e.g., In re Marzocchi*, 439 F.2d 220, 224, 169 USPQ 367, 370 (CCPA 1971). ***The examiner, therefore, must have a reasonable basis to challenge the adequacy of the written description. The examiner has the initial burden of presenting by a preponderance of evidence why a person skilled in the art would not recognize in an applicant's disclosure a description of the invention defined by the claims. Wertheim***, 541 F.2d at 263, 191 USPQ at 97.

See MPEP § 2143 (8th Ed., Rev. February 2003)(emphasis added).

The Examiner has not established with a preponderance of evidence why a person skilled in the art would not recognize the invention defined by the claims. Rather, the Examiner merely asserts, “[t]he specification does not disclose ‘stores values over corrected RGB gamma curves corresponding to the corrected picture data, and gamma-corrects the raw RGB picture data based on values over the stored corrected RGB gamma curves.’” (Office Action at 4).

Applicants respectfully assert these features are readily apparent from the drawings and the specification, for example and illustration purposes only, the Examiner is directed towards FIG. 7 and page 14 of the specification. Accordingly, Applicants respectfully request withdrawal of the rejections to claims 1-10 as the Examiner has not meet the requisite burden and the claims are in full compliance with 35 U.S.C. § 112, first paragraph.

Rejections Under 35 U.S.C. § 112, second paragraph

Claims 1-10, 16-18, 23-24 and 26-27 stand rejected under 35 U.S.C. §112, second paragraph as being allegedly indefinite. Applicants respectfully traverse these rejections.

The second paragraph of 35 U.S.C. § 112, sets forth two separate requirements. First, the claims must set forth the subject matter that applicants regard as their invention. Second, the

claims must particularly point out and distinctly define the metes and bounds of the subject matter that will be protected by the patent grant. Further, when the specification states the meaning that a term in the claim is intended to have, the claim is examined using that meaning, in order to achieve a complete exploration of the applicant's invention and its relation to the prior art. *In re Zletz*, 893 F.2d 319, 13 USPQ 2d 1320 (Fed. Cir. 1989).

The Examiner states “it is not understand [sic] what values are to be stored.” (Office Action at 4). Applicants respectfully direct the Examiner to claims 1 and 7 disclosing in part “stores values over corrected RGB gamma curves corresponding to the corrected picture data.” Additionally for illustration purposes only the Examiner is directed towards Fig. 8 and page 14 of the specification. In view of foregoing, Applicants submit that claims 1 and 7 distinctly define the metes and bounds of the subject matter sought to be protected.

Moreover, claims 5-6, 9, 16, and 26-27 have been amended to better conform with U.S. practice. These amendments are not made for the purpose of avoiding prior art or narrowing the claimed invention and no change in claim scope is intended. Therefore, Applicants do not intend to relinquish any subject matter by these amendments. Applicants respectfully submit that claim 5-6, 9, 16, and 26-27, as amended, fully complies with the requirements of 35 U.S.C. § 112, second paragraph.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. §112, second paragraph rejection of claims 1-10, 16-18, 23-24 and 26-27.

Double Patenting Rejections and Objections

Claims 8-9 were objected to under 37 CFR § 1.75 as being a substantial duplicate of claims 5-6. Applicants respectfully submit that amended claim 9 and cancellation of claim 8 obviates these objections. Accordingly, withdrawal of the objections is respectfully requested.

Claim 28 was provisionally rejected under the judicially created doctrine of obviousness-type double patenting as being allegedly unpatentable over claim 1 of co-pending Application No. 10/154,919.

Claim 28 of the present application is directed towards a method of driving a liquid crystal display device. For example, claim 28 recites a combination of elements including, for example, “a method of driving a liquid crystal display . . . the method comprising the steps of: (a) sequentially transmitting scanning signals to the gate lines” None of these elements are disclosed in claim 1 of co-pending application. Rather, claim 1 of co-pending application is directed towards a liquid crystal display and does not recite method steps. Accordingly, Applicants respectfully request withdrawal of the provisional rejection under obviousness-type double patenting.

Rejections Under 35 U.S.C. § 102

Claim 28 stands rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2002/0180680 A1 issued to Moon. Applicants respectfully traverse this rejection.

The rejection is respectfully traversed because Moon is not prior art to this application. Applicants respectfully submit that the effective date of Moon is May 28, 2002, which is later

than July 10, 2001, the effective filing date of its present Application. It is, therefore, respectfully requested that the rejection under 35 U.S.C. § 102(e) be withdrawn.

Rejections Under 35 U.S.C. § 103

Claims 1-4 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent No. 5,359,342 issued to Nakai, *et al.* ("Nakai") in view of U.S. Patent No. 6,075,514 issued to Ryan, *et al.* ("Ryan"). Applicants respectfully traverse these rejections.

Claim 1 is allowable over the applied references in that claim 1 recites a combination of elements including, for example, "the color correction unit generates corrected RGB picture data based on values over a predetermined imaginative gamma curve established in accordance with the characteristic of the liquid crystal display panel." None of the applied references teaches or suggest at least these features of the claimed invention. Accordingly, Applicants respectfully submit that claim 1 and claims 2-4, which depend from claim 1 are allowable.

Claims 5-10 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Nakai in view of Ryan further in view of admitted prior art. Applicants respectfully traverse these rejections. None of the applied references teach or suggest at least these features of the claimed invention.

Claims 5-6 by virtue of their dependency from claim 1 include all the features of claim 1. For similar reasons as discussed above, with respect to the rejection under 35 U.S.C. § 103, Nakai and Ryan fail to teach or suggest all the limitations of claim 1. Additionally, the alleged admitted prior art fails to cure the deficiencies of Nakai and Ryan. Accordingly, claims 5-6 are allowable by virtue of their dependency from claim 1.

Claim 7 is allowable over the applied references in that claim 7 recites a combination of elements including, for example, “the color correction unit generates corrected RGB picture data based on values over a predetermined imaginative gamma curve established in accordance with the characteristic of the liquid crystal display panel.” None of the applied references teach or suggest at least these features of the claimed invention. Accordingly, Applicants respectfully submit claim 7 and claims 9-10, which depend from claim 7, are allowable over the cited references.

Claims 11-15, 19-21, 25, and 28-32 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Nakai in view of Ryan as applied to claim 1 above and further in view of U.S. Patent No. 5,196,738 issued to Takahara, *et al.* (“Takahara”). Applicants respectfully traverse these rejections.

Claim 11 is allowable over the applied references in that claim 11 recites a combination of elements including, for example, “a control unit, at initial driving, generating corrected picture data corresponding to raw RGB picture data fed from the outside storing the corrected picture data into a predetermined memory, and after the initial driving, upon receipt of raw RGB picture data from the outside, extracting corrected picture data corresponding to the raw RGB picture data from the memory while transmitting the extracted picture data to the data driver.” None of the applied references teach or suggest at least these features of the claimed invention. Accordingly, Applicants respectfully submit that claim 11 and claims 12-15 and 19-21, which depend from claim 11, are allowable over the applied references.

Claim 25 is allowable over the applied references in that claim 25 recites a combination of elements including, for example, “a control unit, at initial driving, generating corrected picture data corresponding to raw RGB picture data fed from the outside while storing the corrected picture data into a predetermined memory, and after the initial driving, upon receipt of raw RGB picture data from the outside, extracting corrected picture data corresponding to the raw RGB picture data from the memory while transmitting the extracted picture data to the data driver.” None of the applied references teach or suggest at least these features of the claimed invention. Accordingly, Applicants respectfully submit that claim 25 is allowable over the applied references.

Claim 28 is allowable over the applied references in that claim 28 recites a combination of elements including, for example, “upon receipt of RGB gray scale data for displaying picture images from the outside, establishing RGB gammas based on the RGB gray scale data and predetermined imaginative gamma curves, and generating data voltages based on the established RGB gammas.” None of the applied references teach or suggest at least these features of the claimed invention. Accordingly, Applicants respectfully submit that claim 28 and claims 28-32, which depend from claim 28, are allowable over the applied references.

Claims 16-17 and 22 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Nakai, Ryan, and Takahara as applied to claim 11 above and further in view of U.S. Patent No. 5,777,590 issued to Saxena, *et al.* (“Saxena”). Applicants respectfully traverse these rejections.

Claims 16-17 and 22 by virtue of their dependency from claim 11 include all the features of claim 11. For similar reasons as discussed above, with respect to the rejection under 35 U.S.C. § 103, Nakai, Ryan, and Takahara fail to teach or suggest all the limitations of claim 11. Additionally, Saxena fails to cure the deficiencies of Nakai and Ryan. Accordingly, Applicants respectfully submit claims 16-17 and 22 are allowable by virtue of their dependency from claim 11.

Claim 18 stands rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Ryan, Takahara, and Saxena as applied to claim 17 above and further in view of U.S. Patent Application Publication No. 2001/00045946 issued to Huang, *et al.* ("Huang"). Applicants respectfully traverse these rejections.

Claims 18 by virtue of their dependencies from claim 11 includes all the features of claim 11. For similar reasons as discussed above, with respect to the rejection under 35 U.S.C. § 103, Nakai, Ryan, Takahara, and Saxena fail to teach or suggest all the limitations of claim 11. Additionally, Huang fails to cure the deficiencies of Nakai, Ryan, Takahara, and Saxena. Accordingly, claim 18 is allowable by virtue of its dependency from claim 18.

Claims 23-24 and 26-27 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Nakai, Ryan, Takahara as applied to claims 11 and 25 above and further in view of allegedly admitted prior art. Applicants respectfully traverse these rejections.

Claims 23-24 by virtue of their dependencies from claim 11 includes all the features of claim 11. For similar reasons as discussed above, with respect to the rejection under 35 U.S.C. § 103, Nakai, Ryan, and Takahara fail to teach or suggest all the limitations of claim 11.

Additionally, Applicants allegedly admitted prior art fails to cure the deficiencies of Nakai, Ryan, and Takahara. Accordingly, claims 23-24 are allowable by virtue of the dependency from claim 11.

Claims 26-27 virtue of their dependencies from claim 11 includes all the features of claim 11. For similar reasons as discussed above, with respect to the rejection under 35 U.S.C. § 103, Nakai, Ryan, and Takahara fail to teach or suggest all the limitations of claim 11. Additionally, Applicants allegedly admitted prior art fails to cure the deficiencies of Nakai, Ryan, and Takahara. Accordingly, claims 26-27 are allowable by virtue of the dependency from claim 11.


CONCLUSION

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submit that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicant's undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,


Hae-Chan Park
Reg. No. 50,114

Date: December 31, 2003

McGuireWoods LLP
1750 Tysons Boulevard
Suite 1800
McLean, VA 22102-4215
Tel: 703-712-5365
Fax: 703-712-5280
HCP:SJH/bjb

\\COM\378907.1